

# **EXHIBIT 6**

**From:** Amy L. Barrette

**Sent:** Wednesday, January 8, 2025 11:14 AM

**To:** Christopher G. Mavros <cgmavros@zarwin.com>; Jessica Riddle <jriddle@zarwin.com>

**Cc:** Amy L. Barrette <amy.barrette@bipc.com>; Tara Klingensmith <tara.klingensmith@bipc.com>; Matthew Pilsner <matthew.pilsner@bipc.com>

**Subject:** RE: Chappell v Precision Forum's request for deposition dates in December 2024

Mr. Watts is no longer a drill site supervisor as Coterra has no drilling going on in the Marcellus currently. His last known address is 913 Marshbrook Rd  
Factoryville, PA 18419.

Amy

**Amy Barrette**  
Shareholder

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501 Grant Street, Suite 200  
Pittsburgh, PA 15219-4413  
412 562 1626 (o)  
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**Buchanan**

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**From:** Christopher G. Mavros <[cgmavros@zarwin.com](mailto:cgmavros@zarwin.com)>

**Sent:** Friday, January 3, 2025 10:44 AM

**To:** Amy L. Barrette <[amy.barrette@bipc.com](mailto:amy.barrette@bipc.com)>; Jessica Riddle <[jriddle@zarwin.com](mailto:jriddle@zarwin.com)>

**Cc:** Christopher G. Mavros <[cgmavros@zarwin.com](mailto:cgmavros@zarwin.com)>

**Subject:** Re: Chappell v Precision Forum's request for deposition dates in December 2024

Amy, considering the discovery deadline and that the deadline won't be extended, we will take the date and let everyone know.

I also would like to depose Craig Watts, please let me know if you can produce him or if he is no longer within your control, please provide his last known contact information.

Thanks,  
Chris



**Christopher G. Mavros , Esq.**

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In order to keep our attorneys and staff safe during the COVID-19 crisis and further to comply with various orders or suggestions from governmental authorities as to remaining closed during that time, Zarwin, Baum, DeVito, Kaplan, Schaer & Toddy has closed all of our offices. Because all attorneys and staff are working remotely, with respect to all of our client matters, including, but not limited to, any litigation matters, we expect to send all documents (including correspondence, pleadings, and discovery) via e-mail until further notice. Because we may not receive regular mail or other deliveries during this period of time, please e-mail copies of anything you send by regular mail or by overnight or other delivery. Kindly send all e-served and all other documents in your matter or case to the e-mail addresses for any Zarwin Baum attorney who is representing you in your matter or case, or who has communicated with you by e-mail on your matter or case. We appreciate your cooperation in this regard.

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---

**From:** Amy L. Barrette <[amy.barrette@bipc.com](mailto:amy.barrette@bipc.com)>  
**Sent:** Thursday, January 2, 2025 5:38 PM  
**To:** Jessica Riddle <[jriddle@zarwin.com](mailto:jriddle@zarwin.com)>  
**Cc:** Christopher G. Mavros <[cgmavros@zarwin.com](mailto:cgmavros@zarwin.com)>  
**Subject:** RE: Chappell v Precision Forum's request for deposition dates in December 2024

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Hi Jessica,

Have you confirmed that all other counsel are available on the 28<sup>th</sup> for Mr. Webster? Please send us a deposition notice if you have.

thanks

**Amy Barrette**

**Shareholder**

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**From:** Jessica Riddle <[jriddle@zarwin.com](mailto:jriddle@zarwin.com)>

**Sent:** Monday, December 16, 2024 2:14 PM

**To:** Amy L. Barrette <[amy.barrette@bipc.com](mailto:amy.barrette@bipc.com)>; Davis, Jeff <[jsdavis@bradley.com](mailto:jsdavis@bradley.com)>; Budner, Michael <[MBudner@smbb.com](mailto:MBudner@smbb.com)>; Matthew Pilsner <[matthew.pilsner@bipc.com](mailto:matthew.pilsner@bipc.com)>; Howard, Ty <[thoward@bradley.com](mailto:thoward@bradley.com)>; Tara Klingensmith <[tara.klingensmith@bipc.com](mailto:tara.klingensmith@bipc.com)>; Robinson, Michelle <[mrubinson@smbb.com](mailto:mrubinson@smbb.com)>; Bell, Andy <[abell@bradley.com](mailto:abell@bradley.com)>; Duffy, Andrew R. <[ADuffy@smbb.com](mailto:ADuffy@smbb.com)>

**Cc:** Chante DePersia <[cndepersia@zarwin.com](mailto:cndepersia@zarwin.com)>; Christopher G. Mavros <[cgmavros@zarwin.com](mailto:cgmavros@zarwin.com)>

**Subject:** RE: Chappell v Precision Forum's request for deposition dates in December 2024

January 28<sup>th</sup> works, please hold that date for his deposition. Chris is also available on February 4<sup>th</sup> to 7<sup>th</sup> & 10<sup>th</sup> to the 14<sup>th</sup>.

Thank you!



**Jessica Riddle, Paralegal**

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**From:** Amy L. Barrette <[amy.barrette@bipc.com](mailto:amy.barrette@bipc.com)>

**Sent:** Monday, December 16, 2024 2:03 PM

**To:** Jessica Riddle <[jriddle@zarwin.com](mailto:jriddle@zarwin.com)>; Davis, Jeff <[jsdavis@bradley.com](mailto:jsdavis@bradley.com)>; Budner, Michael <[MBudner@smbb.com](mailto:MBudner@smbb.com)>; Matthew Pilsner <[matthew.pilsner@bipc.com](mailto:matthew.pilsner@bipc.com)>; Howard, Ty

<[thoward@bradley.com](mailto:thoward@bradley.com)>; Tara Klingensmith <[tara.klingensmith@bipc.com](mailto:tara.klingensmith@bipc.com)>; Robinson, Michelle <[mrubinson@smbb.com](mailto:mrubinson@smbb.com)>; Bell, Andy <[abell@bradley.com](mailto:abell@bradley.com)>; Duffy, Andrew R. <[ADuffy@smbb.com](mailto:ADuffy@smbb.com)>  
**Cc:** Chante DePersia <[cndepersia@zarwin.com](mailto:cndepersia@zarwin.com)>; Christopher G. Mavros <[cgmavros@zarwin.com](mailto:cgmavros@zarwin.com)>  
**Subject:** RE: Chappell v Precision Forum's request for deposition dates in December 2024  
**Importance:** High

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Chris,

Brody Webster is available for his deposition on January 28, 2025. Please let me know as soon as possible whether you plan to proceed on that day. For the remainder of the depositions, I am available to participate on the following dates: January 30, February 3-7, Feb 17-21, and Feb 24-28.

## Amy Barrette

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**From:** Jessica Riddle <[jriddle@zarwin.com](mailto:jriddle@zarwin.com)>

**Sent:** Monday, December 16, 2024 11:14 AM

**To:** Davis, Jeff <[jsdavis@bradley.com](mailto:jsdavis@bradley.com)>; Amy L. Barrette <[amy.barrette@bipc.com](mailto:amy.barrette@bipc.com)>; Budner, Michael <[MBudner@smbb.com](mailto:MBudner@smbb.com)>; Matthew Pilsner <[matthew.pilsner@bipc.com](mailto:matthew.pilsner@bipc.com)>; Howard, Ty <[thoward@bradley.com](mailto:thoward@bradley.com)>; Tara Klingensmith <[tara.klingensmith@bipc.com](mailto:tara.klingensmith@bipc.com)>; Robinson, Michelle <[mrubinson@smbb.com](mailto:mrubinson@smbb.com)>; Bell, Andy <[abell@bradley.com](mailto:abell@bradley.com)>; Duffy, Andrew R. <[ADuffy@smbb.com](mailto:ADuffy@smbb.com)>

**Cc:** Chante DePersia <[cndepersia@zarwin.com](mailto:cndepersia@zarwin.com)>; Christopher G. Mavros <[cgmavros@zarwin.com](mailto:cgmavros@zarwin.com)>

**Subject:** RE: Chappell v Precision Forum's request for deposition dates in December 2024

Good Morning,

We would like to schedule the deposition of Brody Webster, Bob Goodwin, Troy Holliday, Matt Wallace, Magella Mainguy, Kingsley Meniffee, Jeremi Wagner, Bailey Jeffords, Mark Bennett, Joseph Fox, and Justin Guthrie. Please provide availability for late January & February.

Thank you!



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**From:** Davis, Jeff <[jsdavis@bradley.com](mailto:jsdavis@bradley.com)>  
**Sent:** Friday, November 8, 2024 10:25 AM  
**To:** Amy L. Barrette <[amy.barrette@bipc.com](mailto:amy.barrette@bipc.com)>; Budner, Michael <[MBudner@smbb.com](mailto:MBudner@smbb.com)>; Christopher G. Mavros <[cgmavros@zarwin.com](mailto:cgmavros@zarwin.com)>; Jessica Agger <[jagger@zarwin.com](mailto:jagger@zarwin.com)>; Matthew Pilsner <[matthew.pilsner@bipc.com](mailto:matthew.pilsner@bipc.com)>; Howard, Ty <[thoward@bradley.com](mailto:thoward@bradley.com)>; Tara Klingensmith <[tara.klingensmith@bipc.com](mailto:tara.klingensmith@bipc.com)>; Robinson, Michelle <[mrubinson@smbb.com](mailto:mrubinson@smbb.com)>; Bell, Andy <[abell@bradley.com](mailto:abell@bradley.com)>; Duffy, Andrew R. <[ADuffy@smbb.com](mailto:ADuffy@smbb.com)>  
**Cc:** Chante DePersia <[cndepersia@zarwin.com](mailto:cndepersia@zarwin.com)>  
**Subject:** RE: Chappell v Precision Forum's request for deposition dates in December 2024

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If it is the 23<sup>rd</sup>, then I am fine with that.

**Jeff Davis**  
Partner | [Bradley](#)  
[jsdavis@bradley.com](mailto:jsdavis@bradley.com)  
d: 713.576.0370

**From:** Amy L. Barrette <[amy.barrette@bipc.com](mailto:amy.barrette@bipc.com)>  
**Sent:** Friday, November 8, 2024 9:10 AM  
**To:** Budner, Michael <[MBudner@smbb.com](mailto:MBudner@smbb.com)>; Davis, Jeff <[jsdavis@bradley.com](mailto:jsdavis@bradley.com)>; Christopher G. Mavros <[cgmavros@zarwin.com](mailto:cgmavros@zarwin.com)>; Jessica Agger <[jagger@zarwin.com](mailto:jagger@zarwin.com)>; Matthew Pilsner <[matthew.pilsner@bipc.com](mailto:matthew.pilsner@bipc.com)>; Howard, Ty <[thoward@bradley.com](mailto:thoward@bradley.com)>; Tara Klingensmith <[tara.klingensmith@bipc.com](mailto:tara.klingensmith@bipc.com)>; Robinson, Michelle <[mrubinson@smbb.com](mailto:mrubinson@smbb.com)>; Bell, Andy <[abell@bradley.com](mailto:abell@bradley.com)>; Duffy, Andrew R. <[ADuffy@smbb.com](mailto:ADuffy@smbb.com)>  
**Cc:** Chante DePersia <[cndepersia@zarwin.com](mailto:cndepersia@zarwin.com)>  
**Subject:** RE: Chappell v Precision Forum's request for deposition dates in December 2024  
**Importance:** High

Jeff,

I haven't received a response from you on the dates proposed below for Mr. Brown. The start time will have to be 3:35 Central time.



Thanks

## Amy Barrette

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## Buchanan

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**From:** Amy L. Barrette <[amy.barrette@bipc.com](mailto:amy.barrette@bipc.com)>

**Sent:** Tuesday, November 5, 2024 12:26 PM

**To:** Budner, Michael <[MBudner@smbb.com](mailto:MBudner@smbb.com)>; Davis, Jeff <[jsdavis@bradley.com](mailto:jsdavis@bradley.com)>; Christopher G. Mavros <[cgmavros@zarwin.com](mailto:cgmavros@zarwin.com)>; Jessica Agger <[jagger@zarwin.com](mailto:jagger@zarwin.com)>; Matthew Pilsner <[matthew.pilsner@bipc.com](mailto:matthew.pilsner@bipc.com)>; Howard, Ty <[thoward@bradley.com](mailto:thoward@bradley.com)>; Tara Klingensmith <[tara.klingensmith@bipc.com](mailto:tara.klingensmith@bipc.com)>; Robinson, Michelle <[mrubinson@smbb.com](mailto:mrubinson@smbb.com)>; Bell, Andy <[abell@bradley.com](mailto:abell@bradley.com)>; Duffy, Andrew R. <[ADuffy@smbb.com](mailto:ADuffy@smbb.com)>

**Cc:** Chante DePersia <[cndepersia@zarwin.com](mailto:cndepersia@zarwin.com)>; Amy L. Barrette <[amy.barrette@bipc.com](mailto:amy.barrette@bipc.com)>

**Subject:** RE: Chappell v Precision Forum's request for deposition dates in December 2024

Given counsels' schedule conflicts, we will not be able to proceed with Mr. Estes' deposition in December. Do any of you want to proceed with Mr. Brown's deposition the week of the 23<sup>rd</sup> or  
th

30 if he is available? I do not want to waste time trying to schedule him during that time if counsel is not available. I also want to eliminate any future suggestion that Coterra delayed depositions.

## Amy Barrette

### Shareholder

(she/her)

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## Buchanan

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**From:** Budner, Michael <[MBudner@smbb.com](mailto:MBudner@smbb.com)>

**Sent:** Tuesday, November 5, 2024 11:10 AM

**To:** Davis, Jeff <[jsdavis@bradley.com](mailto:jsdavis@bradley.com)>; Amy L. Barrette <[amy.barrette@bipc.com](mailto:amy.barrette@bipc.com)>; Christopher G. Mavros <[cgmavros@zarwin.com](mailto:cgmavros@zarwin.com)>; Jessica Agger <[jagger@zarwin.com](mailto:jagger@zarwin.com)>; Matthew Pilsner <[matthew.pilsner@bipc.com](mailto:matthew.pilsner@bipc.com)>; Howard, Ty <[thoward@bradley.com](mailto:thoward@bradley.com)>; Tara Klingensmith <[tara.klingensmith@bipc.com](mailto:tara.klingensmith@bipc.com)>; Robinson, Michelle <[mrubinson@smbb.com](mailto:mrubinson@smbb.com)>; Bell, Andy <[abell@bradley.com](mailto:abell@bradley.com)>; Duffy, Andrew R. <[ADuffy@smbb.com](mailto:ADuffy@smbb.com)>

**Cc:** Chante DePersia <[cndepersia@zarwin.com](mailto:cndepersia@zarwin.com)>

**Subject:** RE: Chappell v Precision Forum's request for deposition dates in December 2024

I also have a trial that is scheduled to start on 12/9. It's NJ, so it's technically just a listing, but it's our 9<sup>th</sup> or 10<sup>th</sup> listing, so I'm fairly certain that will go, which means I would be unavailable the weeks of 12/9 and 12/16.

## Michael Budner

Partner



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**From:** Davis, Jeff <[jsdavis@bradley.com](mailto:jsdavis@bradley.com)>

**Sent:** Tuesday, November 5, 2024 11:07 AM

**To:** Amy L. Barrette <[amy.barrette@bipc.com](mailto:amy.barrette@bipc.com)>; Christopher G. Mavros <[cgmavros@zarwin.com](mailto:cgmavros@zarwin.com)>; Budner, Michael <[MBudner@smbb.com](mailto:MBudner@smbb.com)>; Jessica Agger <[jagger@zarwin.com](mailto:jagger@zarwin.com)>; Matthew Pilsner <[matthew.pilsner@bipc.com](mailto:matthew.pilsner@bipc.com)>; Howard, Ty <[thoward@bradley.com](mailto:thoward@bradley.com)>; Tara Klingensmith <[tara.klingensmith@bipc.com](mailto:tara.klingensmith@bipc.com)>; Robinson, Michelle <[mrubinson@smbb.com](mailto:mrubinson@smbb.com)>; Bell, Andy <[abell@bradley.com](mailto:abell@bradley.com)>; Duffy, Andrew R. <[ADuffy@smbb.com](mailto:ADuffy@smbb.com)>

**Cc:** Chante DePersia <[cndepersia@zarwin.com](mailto:cndepersia@zarwin.com)>

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All:

My trial that was set for 12/2 has been moved to the week of 12/9, which will likely go the full week and would jeopardize proceeding on 12/12 and 12/13.

We have already mediated the case with no success and we are No. 1 on the docket.

Given the vagaries of trial, I don't have a problem noticing the deposition with the understanding that if I am still in trial, that they will need to be postponed.

Jeff

**Jeff Davis**

Partner | [Bradley](#)  
[jsdavis@bradley.com](mailto:jsdavis@bradley.com)  
d: 713.576.0370

**From:** Amy L. Barrette <[amy.barrette@bipc.com](mailto:amy.barrette@bipc.com)>  
**Sent:** Tuesday, November 5, 2024 9:38 AM  
**To:** Christopher G. Mavros <[cgmavros@zarwin.com](mailto:cgmavros@zarwin.com)>; Budner, Michael <[MBudner@smbb.com](mailto:MBudner@smbb.com)>; Jessica Agger <[jagger@zarwin.com](mailto:jagger@zarwin.com)>; Davis, Jeff <[jsdavis@bradley.com](mailto:jsdavis@bradley.com)>; Matthew Pilsner <[matthew.pilsner@bipc.com](mailto:matthew.pilsner@bipc.com)>; Howard, Ty <[thoward@bradley.com](mailto:thoward@bradley.com)>; Tara Klingensmith <[tara.klingensmith@bipc.com](mailto:tara.klingensmith@bipc.com)>; Robinson, Michelle <[mrubinson@smbb.com](mailto:mrubinson@smbb.com)>; Bell, Andy <[abell@bradley.com](mailto:abell@bradley.com)>; Duffy, Andrew R. <[ADuffy@smbb.com](mailto:ADuffy@smbb.com)>  
**Cc:** Chante DePersia <[cndepersia@zarwin.com](mailto:cndepersia@zarwin.com)>  
**Subject:** RE: Chappell v Precision Forum's request for deposition dates in December 2024

Neither I nor Coterra has any control over Mr. Brown's schedule at this point, so I cannot guarantee he will be available during the 12<sup>th</sup>- 17<sup>th</sup>, or at any time in December. If all counsel could give me their availability for the 12<sup>th</sup> through the 17<sup>th</sup>, that would be a great start.

**Amy Barrette**

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**From:** Christopher G. Mavros <[cgmavros@zarwin.com](mailto:cgmavros@zarwin.com)>

**Sent:** Monday, November 4, 2024 2:51 PM

**To:** Amy L. Barrette <[amy.barrette@bipc.com](mailto:amy.barrette@bipc.com)>; Budner, Michael <[MBudner@smbb.com](mailto:MBudner@smbb.com)>; Jessica Agger <[jagger@zarwin.com](mailto:jagger@zarwin.com)>; Davis, Jeff <[jsdavis@bradley.com](mailto:jsdavis@bradley.com)>; Matthew Pilsner <[matthew.pilsner@bipc.com](mailto:matthew.pilsner@bipc.com)>; Howard, Ty <[thoward@bradley.com](mailto:thoward@bradley.com)>; Tara Klingensmith <[tara.klingensmith@bipc.com](mailto:tara.klingensmith@bipc.com)>; Robinson, Michelle <[mrubinson@smbb.com](mailto:mrubinson@smbb.com)>; Bell, Andy <[abell@bradley.com](mailto:abell@bradley.com)>; Duffy, Andrew R. <[ADuffy@smbb.com](mailto:ADuffy@smbb.com)>

**Cc:** Chante DePersia <[cndepersia@zarwin.com](mailto:cndepersia@zarwin.com)>

**Subject:** Re: Chappell v Precision Forum's request for deposition dates in December 2024

Thanks, Amy. Would be good to schedule these on the same day if possible.



### Christopher G. Mavros , Esq.

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Email: [cgmavros@zarwin.com](mailto:cgmavros@zarwin.com)



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litigation matters, we expect to send all documents (including correspondence, pleadings, and discovery) via e-mail until further notice. Because we may not receive regular mail or other deliveries during this period of time, please e-mail copies of anything you send by regular mail or by overnight or other delivery. Kindly send all e-served and all other documents in your matter or case to the e-mail addresses for any Zarwin Baum attorney who is representing you in your matter or case, or who has communicated with you by e-mail on your matter or case. We appreciate your cooperation in this regard.

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---

**From:** Amy L. Barrette <[amy.barrette@bipc.com](mailto:amy.barrette@bipc.com)>  
**Sent:** Monday, November 4, 2024 2:29 PM  
**To:** Budner, Michael <[MBudner@smbb.com](mailto:MBudner@smbb.com)>; Christopher G. Mavros <[cgmavros@zarwin.com](mailto:cgmavros@zarwin.com)>; Jessica Agger <[jagger@zarwin.com](mailto:jagger@zarwin.com)>; Davis, Jeff <[jsdavis@bradley.com](mailto:jsdavis@bradley.com)>; Matthew Pilsner <[matthew.pilsner@bipc.com](mailto:matthew.pilsner@bipc.com)>; Howard, Ty <[thoward@bradley.com](mailto:thoward@bradley.com)>; Tara Klingensmith <[tara.klingensmith@bipc.com](mailto:tara.klingensmith@bipc.com)>; Robinson, Michelle <[mrubinson@smbb.com](mailto:mrubinson@smbb.com)>; Bell, Andy <[abell@bradley.com](mailto:abell@bradley.com)>; Duffy, Andrew R. <[ADuffy@smbb.com](mailto:ADuffy@smbb.com)>  
**Cc:** Chante DePersia <[cndepersia@zarwin.com](mailto:cndepersia@zarwin.com)>; Amy L. Barrette <[amy.barrette@bipc.com](mailto:amy.barrette@bipc.com)>  
**Subject:** RE: Chappell v Precision Forum's request for deposition dates in December 2024

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Counsel,

Mr. Estes is available for his deposition on the following dates: 12/12, 12/13, 12/16, or 12/17. Please confirm by the end of the week whether any of those dates work for you so that we can lock this in place before his schedule changes. I should have dates for Mr. Brown shortly.

Amy

## Amy Barrette

### Shareholder

(she/her)

Union Trust Building

501 Grant Street, Suite 200

Pittsburgh, PA 15219-4413

412 562 1626 (o)

[amy.barrette@bipc.com](mailto:amy.barrette@bipc.com)

## Buchanan

[vCard](#) | [Bio](#) | [BIPC.com](#) | [Twitter](#) | [LinkedIn](#)

**From:** Budner, Michael <[MBudner@smbb.com](mailto:MBudner@smbb.com)>

**Sent:** Friday, November 1, 2024 3:12 PM

**To:** Christopher G. Mavros <[cgmavros@zarwin.com](mailto:cgmavros@zarwin.com)>; Amy L. Barrette <[amy.barrette@bipc.com](mailto:amy.barrette@bipc.com)>; Jessica Agger <[jagger@zarwin.com](mailto:jagger@zarwin.com)>; Davis, Jeff <[jsdavis@bradley.com](mailto:jsdavis@bradley.com)>; Matthew Pilsner <[matthew.pilsner@bipc.com](mailto:matthew.pilsner@bipc.com)>; Howard, Ty <[thoward@bradley.com](mailto:thoward@bradley.com)>; Tara Klingensmith <[tara.klingensmith@bipc.com](mailto:tara.klingensmith@bipc.com)>; Robinson, Michelle <[mrubinson@smbb.com](mailto:mrubinson@smbb.com)>; Bell, Andy <[abell@bradley.com](mailto:abell@bradley.com)>; Duffy, Andrew R. <[ADuffy@smbb.com](mailto:ADuffy@smbb.com)>

**Cc:** Chante DePersia <[cndepersia@zarwin.com](mailto:cndepersia@zarwin.com)>

**Subject:** RE: Chappell v Precision Forum's request for deposition dates in December 2024

That's fine with me, as well. Thanks.

## Michael Budner

Partner



One Liberty Place, 1650 Market Street, 52<sup>nd</sup> Floor

Philadelphia, PA 19103

+1 215.575.3875 (office) | +1 215.380.9312 (cell)

[mbudner@smbb.com](mailto:mbudner@smbb.com) | [www.smbb.com](http://www.smbb.com)

**From:** Christopher G. Mavros <[cgmavros@zarwin.com](mailto:cgmavros@zarwin.com)>

**Sent:** Friday, November 1, 2024 2:04 PM

**To:** Amy L. Barrette <[amy.barrette@bipc.com](mailto:amy.barrette@bipc.com)>; Jessica Agger <[jagger@zarwin.com](mailto:jagger@zarwin.com)>; Davis, Jeff <[jsdavis@bradley.com](mailto:jsdavis@bradley.com)>; Matthew Pilsner <[matthew.pilsner@bipc.com](mailto:matthew.pilsner@bipc.com)>; Budner, Michael <[MBudner@smbb.com](mailto:MBudner@smbb.com)>; Howard, Ty <[thoward@bradley.com](mailto:thoward@bradley.com)>; Tara Klingensmith <[tara.klingensmith@bipc.com](mailto:tara.klingensmith@bipc.com)>; Robinson, Michelle <[mrubinson@smbb.com](mailto:mrubinson@smbb.com)>; Bell, Andy <[abell@bradley.com](mailto:abell@bradley.com)>; Duffy, Andrew R. <[ADuffy@smbb.com](mailto:ADuffy@smbb.com)>

**Cc:** Chante DePersia <[cndepersia@zarwin.com](mailto:cndepersia@zarwin.com)>

**Subject:** Re: Chappell v Precision Forum's request for deposition dates in December 2024

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Amy, I am fine with these deps being conducted remotely. Thanks



**Christopher G. Mavros , Esq.**

One Commerce Square

2005 Market Street | 16<sup>th</sup> Floor | Philadelphia, PA 19103-7042

Main Number: 215-569-2800

Direct Fax: 267-765-

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**From:** Amy L. Barrette <[amy.barrette@bipc.com](mailto:amy.barrette@bipc.com)>

**Sent:** Thursday, October 31, 2024 11:43 AM

**To:** Jessica Agger <[jagger@zarwin.com](mailto:jagger@zarwin.com)>; Davis, Jeff <[jsdavis@bradley.com](mailto:jsdavis@bradley.com)>; Matthew Pilsner <[matthew.pilsner@bipc.com](mailto:matthew.pilsner@bipc.com)>; Budner, Michael <[MBudner@smbb.com](mailto:MBudner@smbb.com)>; Howard, Ty <[thoward@bradley.com](mailto:thoward@bradley.com)>; Tara Klingensmith <[tara.klingensmith@bipc.com](mailto:tara.klingensmith@bipc.com)>; Robinson, Michelle <[mrubinson@smbb.com](mailto:mrubinson@smbb.com)>; Bell, Andy <[abell@bradley.com](mailto:abell@bradley.com)>; Duffy, Andrew R. <[ADuffy@smbb.com](mailto:ADuffy@smbb.com)>; Christopher G. Mavros <[cgmavros@zarwin.com](mailto:cgmavros@zarwin.com)>

**Cc:** Chante DePersia <[cndepersia@zarwin.com](mailto:cndepersia@zarwin.com)>

**Subject:** Chappell v Precision Forum's request for deposition dates in December 2024

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Counsel,

Given the holidays, December is not ideal for the depositions, but I will work on dates. There are logistical issues. Mr. Estes's office is in Texas. If he has to travel, that will impact his available dates. Do all counsel agree to conduct his deposition via video? If not, I propose the deposition be held at Buchanan's office in Pittsburgh. This location will be easier for everyone traveling. That beats everyone having to travel to Susquehanna County.

Please let me know as soon as possible.

## Amy Barrette

### Shareholder

(she/her)

Union Trust Building

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Pittsburgh, PA 15219-4413

412 562 1626 (o)

[amy.barrette@bipc.com](mailto:amy.barrette@bipc.com)

## Buchanan

[vCard](#) | [Bio](#) | [BIPC.com](#) | [Twitter](#) | [LinkedIn](#)

**From:** Jessica Agger <[jagger@zarwin.com](mailto:jagger@zarwin.com)>

**Sent:** Thursday, October 31, 2024 8:34 AM

**To:** Davis, Jeff <[jsdavis@bradley.com](mailto:jsdavis@bradley.com)>; Matthew Pilsner <[matthew.pilsner@bipc.com](mailto:matthew.pilsner@bipc.com)>; Budner, Michael <[MBudner@smbb.com](mailto:MBudner@smbb.com)>; Amy L. Barrette <[amy.barrette@bipc.com](mailto:amy.barrette@bipc.com)>; Howard, Ty <[thoward@bradley.com](mailto:thoward@bradley.com)>; Tara Klingensmith <[tara.klingensmith@bipc.com](mailto:tara.klingensmith@bipc.com)>; Robinson, Michelle <[mrubinson@smbb.com](mailto:mrubinson@smbb.com)>; Bell, Andy <[abell@bradley.com](mailto:abell@bradley.com)>; Duffy, Andrew R. <[ADuffy@smbb.com](mailto:ADuffy@smbb.com)>

**Cc:** Christopher G. Mavros <[cgmavros@zarwin.com](mailto:cgmavros@zarwin.com)>; Chante DePersia <[cndepersia@zarwin.com](mailto:cndepersia@zarwin.com)>

**Subject:** RE: #44410 Chappell - Discovery Requests

Good Morning Counsel,

We are withdrawing out requests to Cabot. We would like to schedule depositions of Shane

Brown & Frank Estes. Please let me know availability for December.

Thank you!



**Jessica Agger, Paralegal**

One Commerce Square

2005 Market Street | 16<sup>th</sup> Floor | Philadelphia, PA 19103-7042

Direct Dial:

215.569.2800

Email: [jagger@zarwin.com](mailto:jagger@zarwin.com)



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**From:** Jessica Agger

**Sent:** Friday, October 25, 2024 9:56 AM

**To:** Davis, Jeff <[jsdavis@bradley.com](mailto:jsdavis@bradley.com)>; Matthew Pilsner <[matthew.pilsner@bipc.com](mailto:matthew.pilsner@bipc.com)>; Budner, Michael <[MBudner@smbb.com](mailto:MBudner@smbb.com)>; Amy L. Barrette <[amy.barrette@bipc.com](mailto:amy.barrette@bipc.com)>; Howard, Ty <[thoward@bradley.com](mailto:thoward@bradley.com)>; Tara Klingensmith <[tara.klingensmith@bipc.com](mailto:tara.klingensmith@bipc.com)>; Robinson, Michelle <[mrubinson@smbb.com](mailto:mrubinson@smbb.com)>; Bell, Andy <[abell@bradley.com](mailto:abell@bradley.com)>; Duffy, Andrew R. <[ADuffy@smbb.com](mailto:ADuffy@smbb.com)>

**Cc:** Christopher G. Mavros <[cgmavros@zarwin.com](mailto:cgmavros@zarwin.com)>; Chante DePersia <[cndepersia@zarwin.com](mailto:cndepersia@zarwin.com)>

**Subject:** #44410 Chappell - Discovery Requests

Good Morning,

Attached please find Defendant, Forum Tech's discovery requests directed to all parties.

Thank you!



**Jessica Agger, Paralegal**

One Commerce Square

2005 Market Street | 16<sup>th</sup> Floor | Philadelphia, PA 19103-7042

Direct Dial:

215.569.2800

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